

FILED
AUG 03 2022
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PRISCILLA D. WILLIAMS,

Defendant.

) INDICTMENT
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CASE NO.

1:22 CR 442

Title 18, United States Code,
Sections 1028A(a)(1) and 1344

JUDGE PEARSON

GENERAL ALLEGATIONS

MAG. JUDGE BAUGHMAN

At all times material and relevant to this Indictment:

1. Defendant PRISCILLA D. WILLIAMS was a resident of Cleveland, Ohio, located in the Northern District of Ohio, Eastern Division.
2. Bank-1 and Bank-2 were financial institutions, as defined under Title 18, United States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance Corporation.
3. Victim-1 was a resident of North Ridgeville, Ohio.

COUNTS 1-2

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury charges:

4. Paragraphs 1 through 3 of this Indictment are realleged and incorporated by reference as if fully set forth herein.

ORIGINAL

5. In or around May 2021, Defendant obtained a laptop that had Victim-1's personal identifying information, including name, date of birth, and social security number.

6. On or about May 21, 2021, Defendant fraudulently applied online for a credit card account from Bank-1 using the name, date of birth, and social security number of Victim-1, without Victim-1's knowledge, authorization, or consent.

7. On or about May 23, 2021, Defendant fraudulently applied online for a credit card account from Bank-2 using the name, date of birth, and social security number of Victim-1, without Victim-1's knowledge, authorization, or consent.

8. The term "means of identification," as defined under Title 18, United States Code, Section 1028(d)(7), for purposes of this Indictment, means any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual and includes any name, social security number, date of birth, and unique electronic identification code, address or routing code, including a credit or debit card number.

9. From on or about May 21, 2021, to on or about June 20, 2021, in the Northern District of Ohio, Eastern Division, Defendant PRISCILLA D. WILLIAMS knowingly possessed and used, without lawful authority, a means of identification of another person, that is the name, date of birth, and social security number of Victim-1 (a real person known to the Grand Jury) to apply for credit card accounts from Bank-1 and Bank-2, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit: the commission of Bank Fraud, a violation of Title 18, United States Code, Section 1344, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1), each credit card application constituting a separate count as set forth below:

<u>Count</u>	<u>Victim</u>	<u>Means of Identification</u>	<u>Financial Institution Credit Card Application</u>
1	Victim-1	Name, date of birth, and social security number	Bank-1
2	Victim-1	Name, date of birth, and social security number	Bank-2

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNTS 3-4
(Bank Fraud, 18 U.S.C. § 1344)

The Grand Jury further charges:

10. Paragraphs 1 through 3 and 5 through 8 of this Indictment are realleged and incorporated by reference as if fully set forth herein.

11. On or about May 23, 2021, Defendant used the Bank-2 credit card account to make an unauthorized purchase in the amount of \$572.36.

12. On or about May 31, 2021, Defendant used the Bank-1 credit card account to make an unauthorized purchase in the amount of \$6.95.

13. From on or about May 21, 2021, to on or about June 20, 2021, in the Northern District of Ohio, Eastern Division, Defendant PRISCILLA D. WILLIAMS, knowingly executed and attempted to execute a scheme and artifice to defraud Bank-1 and Bank-2, federally insured financial institutions, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of Bank-1 and Bank-2, by means of false and fraudulent pretenses, representations, and promises, each unauthorized purchase constituting a separate count as set forth below:

<u>Count</u>	<u>Date</u>	<u>Financial Institution</u>	<u>Description of Fraud</u>	<u>Amount</u>
3	05/23/2021	Bank-2	Unauthorized Purchase	\$572.36
4	05/31/2021	Bank-1	Unauthorized Purchase	\$6.95

All in violation of Title 18, United States Code, Section 1344.

FORFEITURE SPECIFICATION

The Grand Jury further charges:

14. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2), the allegations of Counts 3 through 4 are incorporated herein by reference. As a result of the foregoing offenses, Defendant PRISCILLA D. WILLIAMS, shall forfeit to the United States any property, constituting or derived from proceeds obtained directly or indirectly as a result of the violations charged in Counts 3 through 4; including, but not limited to: a money judgment in the amount of the proceeds traceable to the violations in Counts 3 and 4.

SUBSTITUTE ASSETS

If, as a result of any act or omission Defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of Defendant up to the value of the forfeitable property described above.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.